

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TESORO REFINING AND MARKETING
COMPANY LLC,

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendant.

Case No.: SA-CV-13-00931-DAE

Assigned to: Hon. David A. Ezra

Referred to: Hon. Henry J. Bemporad

Date Filed: May 6, 2013

Trial Date: None Set

**PLAINTIFF TESORO REFINING AND MARKETING CO. LLC'S
DESIGNATION OF REBUTTAL EXPERT WITNESS**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes Plaintiff in the above styled and numbered cause and files Plaintiff's Designation of Rebuttal Expert Witness pursuant to the provisions of the Court's Scheduling Order, and in such regard, would show unto the Court as follows:

I.

RETAINED REBUTTAL EXPERT WITNESS

Plaintiff hereby designates the following individual as a rebuttal expert witness which it will call to testify by deposition or otherwise during the trial of this case:

1. Robert Anderson; 107 West Laurelhurst, The Woodlands, Texas 77382.

Mr. Anderson will offer expert testimony in response to the opinions of James C. Spindler and Scott Bayley, who submitted an expert report on behalf of National Union on the subject of Tesoro's credit risk management practices. Mr. Anderson is the Executive Director of the Committee of Chief Risk Officers ("CCRO") and President of the Energy Data Hub Company. He is an expert in corporate risk management in the energy industry, and has helped clients develop risk management policies, methods, and infrastructure.

Dated: August 28, 2014

MANATT, PHELPS & PHILLIPS, LLP

By: 

Craig J. de Recat

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Attorneys for Plaintiff

TESORO REFINING & MARKETING CO. LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the United States District Court for the Western District of Texas, San Antonio Division, with notice of case activity to be generated and sent electronically by the Clerk of the Court to all counsel of record and mailed by electronic mail to all non-CM/ECF participants.

On this 28th day of August, 2014.

/s/ Jessamyn E. Vedro

Jessamyn E. Vedro